

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ROTEM ROSEN,

Plaintiff/Counterclaim Defendant,

-against-

ALEX SAPIR AND 260-261 MADISON AVENUE
JUNIOR MEZZANINE LLC,

Defendants/Counterclaim Plaintiffs.

CASE NO.: 1:20-cv-05844

HON. RONNIE ABRAMS

NOTICE OF CROSS-MOTION

PLEASE TAKE NOTICE that, upon the annexed Statement of Material Facts, the Declaration of Alex Sapir dated February 24, 2022, the exhibits thereto, the Declaration of Zina Sapir dated February 17, 2022, the Declaration of Dimitri Barinstein dated February 21, 2022, and the accompanying Memorandum of Law, Defendants/Counterclaim Plaintiffs will move this Court, before the Honorable Ronnie Abrams, United States District Judge, at a time to be determined by the Court, at the United States District Court for the Southern District of New York, 40 Foley Square, New York, New York 10007, for an Order dismissing Plaintiff/Counterclaim Defendant's second and third causes of action pursuant to Fed. R. Civ. P. 56; and granting such other relief as the Court may deem just and proper.

Dated: February 24, 2022
New York, New York

Respectfully submitted,

By: s/Andrew J. Urgenson
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Counterclaim Plaintiffs*
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